IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Peter M. Galligan,	§	
	§	
PLAINTIFF	§	
	§	
V.	§	CIVIL CASE No. 1:17-cv-06310
	§	
ADTALEM GLOBAL EDUCATION INC. F/K/A	§	
DEVRY EDUCATION GROUP; ADTALEM	§	
GLOBAL HEALTH, INC. F/K/A DEVRY	§	
MEDICAL INTERNATIONAL, INC.; ROSS	§	
UNIVERSITY SCHOOL OF MEDICINE	§	
SCHOOL OF VETERINARY MEDICINE (ST.	§	
KITTS) LIMITED; AND DOES 1 THROUGH	§	
50,	§	
	§	
DEFENDANTS	§	JURY TRIAL DEMANDED

PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR RESPONSE TO DEFENDANTS' MOTION TO DISMISS

Plaintiff Peter M. Galligan ("Galligan") files this Unopposed Motion for Leave to Exceed Page Limit for Response to Defendants' Motion to Dismiss, pursuant to Local Rule 7.1, because the nature of Defendants' motion and the number of claims at issue require briefing in excess of 15 pages.

Defendants' Motion to Dismiss [Dkts. 18-20] seeks the dismissal of all of Plaintiff's claims in this proceeding. Plaintiff's claims center on the failure by Defendants Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited, and Does 1 through 50 (collectively, "Defendants") to appropriately accommodate his documented learning disabilities, which Plaintiff alleges constituted violations of federal, state, and common

law. To adequately respond to Defendants' arguments, Plaintiff must demonstrate the validity of the legal bases for the ten claims at issue. Accordingly, Plaintiff respectfully requests leave to file a brief exceeding the 15-page limitation prescribed by this Court's local rules, but in all events totaling 30 pages or less. Plaintiff does not make this request to burden the Court, but so that justice may be done.

Defendants are *unopposed* to the relief sought in this Motion.

Dated this 10th day of January, 2018.

Respectfully submitted,

/s/ Michael W. Ford

Michael W. Ford, Esq.
Law Offices of Michael W. Ford
(local counsel)
4 Timberwood Lane
Riverwoods, IL 60015

Telephone: (847) 948-7884 Email: mfordski@aol.com

IL Bar # 0846139

Member, Trial Bar U.S. District Court N.D. IL

- and -

/s/ Emil T. Bayko

Emil T. Bayko PORTER HEDGES LLP 1000 Main Street, 36th Floor Houston, Texas 77002 Telephone: (713) 226-6608 Facsimile: (713) 226-6208

Email: tbayko@porterhedges.com

IL Bar # 0141356

ATTORNEYS FOR PLAINTIFF PETER M. GALLIGAN

OF COUNSEL:

Kyle Reeb Texas State Bar No. 24091604 Federal ID No. 2571829 Jim Aycock Texas State Bar No. 24034309 Federal ID No. 20675 Alison P. Henderson Texas State Bar No. 24087707 Federal ID No. 2228628 PORTER HEDGES LLP 1000 Main Street, 36th Floor Houston, Texas 77002 Telephone: (713) 226-6000 Facsimile: (713) 226-6211 kreeb@porterhedges.com jaycock@porterhedges.com ahenderson@porterhedges.com

CERTIFICATE OF CONFERENCE

I certify that on January 9, 2018, my associate – Alison P. Henderson – conferred with Megan Troy, counsel for Defendants, via telephone regarding the substance of this Motion. Counsel for Defendants confirmed via e-mail that Defendants are unopposed to the relief sought by this Motion.

/s/ Emil T. Bayko
Emil T. Bayko

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, a true and correct copy of the foregoing pleading was electronically filed in accordance with the Federal Rules of Civil Procedure and was served via e-mail upon the following counsel of record:

Brian Stolzenbach Megan Troy SEYFARTH SHAW LLP 233 S. Wacker Drive, Suite 8000 Chicago, IL 60606-6448 (312) 460-5551 bstolzenbach@seyfarth.com mtroy@seyfarth.com

/s/ Emil T. Bayko
Emil T. Bayko